

I oppose the proposal to allow the operation of unlicensed RF Identification Devices between 425 MHz and 435 MHz (i.e. on the 70 cm amateur radio band).

Beyond the potential for significant interference that could be caused by routine operation of such devices, I am concerned about the potential for abuse of this technology, in that devices transmitting RF ID data could fail in a chattering mode, transmitting continually even when not being queried, causing harmful interference, particularly interfering with experimentation with weak signals on the 70 cm amateur radio band.

It's conceivable that a malfunctioning device could be located on a package on a delivery truck anywhere, e.g. in the course of making deliveries in a residential area (and that the device could even continue transmitting after the package is delivered and the packaging is discarded). If these devices are unlicensed, there is no way to exert control over malfunctioning devices. There would be no incentive to design safeguards into the devices to prevent continual transmission; in fact, there could easily be motivation to design them to fail in a chattering mode rather than fail into a silent mode. Also, being unlicensed, it wouldn't be clear who is the owner of the device after the package is delivered, so who would you contact to get the interfering device turned off?

Since the point of the tags would be to be inexpensive, they would be designed to be inexpensive and more likely prone to failure, with users tolerating a much higher failure rate than for licensed equipment.

Another potential for abuse could be the misuse of this sort of device as a misguided anti-theft device, attached to some item of value by its owner and intentionally set to transmit continually, in an attempt to be able to locate the item should it ever be stolen or misplaced. Without a requirement for licensing, there is nothing to prevent this sort of abuse and the ubiquitous harmful interference it could cause, particularly throughout residential areas.

In summary I feel the consequences for abuse of this technology, and of the failure potential and failure modes of these devices when made cheaply are not being adequately addressed. I agree with and support the position of the ARRL on this matter. I oppose the proposal to allow the operation of these unlicensed RF Identification Devices on the 70 cm amateur radio band.

Thank you for your consideration of my comments.